DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Minneapolis District
240 Hennepin Avenue
Minneapolis MN 55401-1999
Telephone: 612-334-4100

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PURGED BK

May 24, 1999

WARNING LETTER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Refer to MIN 99 - 31

John B. Everitt
President
Stearns Packaging Corporation
4200 Sycamore Avenue
Madison, Wisconsin 53714

Dear Mr. Everitt:

During an inspection of your veterinary drug manufacturing facility located at Madison, WI, conducted on April 27, 29, and 30, 1999, our investigator found significant deviations from the Good Manufacturing Practices for Finished Pharmaceuticals [Title 21, Code of Federal Regulations, Part 211 (21 CFR 211)]. Such deviations cause veterinary drugs manufactured at this facility to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act (the Act).

Our investigation revealed the following deviations:

> 21 CFR 211.160(a) The establishment of any specifications, standards, sampling plans, test procedures, or other laboratory control mechanisms required by this subpart, including any change in such specifications, standards, sampling plans, test procedures, or other laboratory control mechanisms, shall be drafted by the appropriate organizational unit and reviewed and approved by the quality control unit.

There are no specifications for the active ingredients in the iodine teat dips, the chlorhexidine teat dip, the quaternary teat dip, or the chlorhexidine udder wash.

21 CFR 211.165(a) For each batch of drug product there shall be an appropriate laboratory determination of satisfactory conformance to final specifications for the drug product, including the identity and strength of each active ingredient, prior to release.

The active ingredient(s) in the chlorhexidine teat dip, the quaternary teat dip, and the chlorhexidine udder wash are not determined.

21 CFR 211.165(f) Drug products failing to meet established standards or specifications and any other relevant quality control criteria shall be rejected.

The pH for lots 082181, 082182, 090981, 092981, 092982, 102181, 111181, 111182, 113081, 113082, 121881, 011991, 020391, and 020392 of the 0.5% iodine teat dip did not meet the specification. The assays for lots 113081 and 113082 of the 0.5% iodine teat dip were not run. The refractive index for lot 040791 of the 1% iodine teat dip is outside the limits. The pH for lots 090971 and 092971 of the quaternary teat dip are outside the limits.

21 CFR 211.80(a) There shall be written procedures describing in sufficient detail the receipt, identification, storage, handling, sampling, testing, and approval or rejection of components and drug products containers and closures.

There are no written procedures.

21 CFR 211. 84(d)(3) Containers and closures shall be tested for conformance with all appropriate written procedures.

No tests are done.

21 CFR 211.100(a) There shall be written procedures for production and process control designed to assure that the drug products have the identity, strength, quality, and purity they purport or are represented to possess.

The temperatures are specified as "hot" or "cold." This is too vague. The order of addition is not specified and the mixing speed and time are not specified.

21 CFR 211.67(b)(3) Written procedures shall be established and followed for cleaning and maintenance of equipment, including utensils, used in the manufacture, processing, packing, or holding of a drug product. A description in sufficient detail of the methods, equipment, and materials used in cleaning and maintenance operations, and the methods of disassembling and reassembling equipment as necessary to assure proper cleaning and maintenance.

No written cleaning procedures or records exist. The cleaning process used can not assure proper cleaning since the procedure is not validated.

21 CFR 211.122(a) There shall be written procedures describing in sufficient detail the receipt, identification, storage, handling, sampling, examination, and/or testing of labeling and packaging materials.

No written procedures exist.

21 CFR 211.122(d) Labels and other labeling materials for each different drug product, strength, dosage form, or quantity of contents shall be stored separately with suitable identification.

Storage of labels is inadequate.

21 CFR 211.130 There shall be written procedures designed to assure that correct labels, labeling, and packaging materials are used for drug products.

No written procedures exist.

21 CFR 211.137(a) To assure that a drug product meets applicable standards of identity, strength, quality, and purity at the time of use, it shall bear an expiration date determined by appropriate stability testing described in 211.166.

No stability data exists.

21 CFR 211.150(b) Written procedures shall be established, and followed, describing the distribution of drug products. They shall include a system by which the distribution of each lot of drug product can be readily determined to facilitate its recall if necessary.

No written procedures or system exists. An effective recall would be difficult to conduct.

221 CFR 211.186(b)(8) A description of the drug product containers, closures, and packaging materials, including a specimen or copy of each label and all other labeling signed and dated by the person or persons responsible for approval of such labeling.

There is no description of product container/closure systems and no master specimens of labels.

21 CFR 211.188(b) Batch production and control records shall be prepared for each batch of drug product produced and shall include complete information relating to the production and control of each batch. These records shall include documentation that each significant step in the manufacture, processing, packing, or holding of the batch was accomplished.

The records do not contain specific identification of each lot of component used [21 CFR 211.188(b)(3)].

The records do not contain statements of actual versus theoretical yields [21 CFR 211.188(b)(7)].

The records do not contain specimens of labels used [21 CFR 211.188(b)(8)].

The records do not contain the identification of the persons performing and checking each significant step [21 CFR 211.188(b)(11)].

21 CFR 211.194 Laboratory records shall include complete data derived from all tests necessary to assure compliance with established specifications and standards.

Laboratory records do not exist.

Since all of your teat dips and udder washes are considered veterinary drugs, your firm must register and list the drug products manufactured. A copy of the regulation, 21 CFR 207, the registration form (form FDA-2656), and the listing form (form FDA-2657) are enclosed. I have also enclosed a copy of the Good Manufacturing Practices for Finished Pharmaceuticals, 21 CFR 211. Additional information can be obtained at *www.FDA.gov/ceder/regguide.htm* and *www.FDA.gov/cvm/default.htm*.

The above is not intended to be an all-inclusive list of violations. A copy of the form FDA-483, Inspectional Observations, issued to and discussed with you is attached for your review. As a manufacturer of veterinary drugs, you are responsible for ensuring that your overall operation and the products you manufacture and distribute are in compliance with the law.

You should take prompt action to correct these violations and to establish procedures to prevent their recurrence. Failure to promptly correct these violations may result in regulatory action without further notice, such as seizure and/or injunction.

You should notify this office in writing within 15 days of receipt of this letter, of the specific steps you have taken to correct the noted violations, including an explanation of each step being taken to prevent the recurrence of similar violations. If corrective action cannot be completed within 15 working days, state the reason for the delay and the time within which the corrections will be

completed. Also include copies of any available documentation demonstrating that corrections have been made.

Your reply should be directed to Compliance Officer Robert P. Snell at the address indicated on the letterhead.

Sincerely,

Edwin S. Dee
Acting Director
Minneapolis District

RPS/ccl

Enclosures: 21 CFR 207
21 CFR 211
FDA-2656
FDA-2657
FDA-483, 4/30/99